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6 UNITED STATES DISTRICT COURT
7 EASTERN DISTRICT OF WASHINGTON

8 DISABILITY RIGHTS WASHINGTON,

No. CV-09-024-JLQ

9 Plaintiff,

10 vs.

DECLARATION OF JOSE
ALARCON

11 PENRITH FARMS, JAMES BREWSTER
12 and SHERRY BREWSTER, and STEVEN
13 A. CARRERAS,

14 Defendants.

15 I, Jose Alarcon, M.D., declare as follows:

16 1. I am over the age of eighteen, have personal knowledge of the matters
17 herein and am competent to testify thereto.

18 2. I am licensed to practice medicine in the state of New York.

19 3. I have been in the practice of psychiatry since 1972.

20 4. I am recognized as a diplomat by the American Board of Psychiatry and
Neurology.

1 5. I have provided psychiatric treatment to J [REDACTED] S [REDACTED] since June 26,
2 2008, and continue to do so to this day.

3 6. My current diagnostic impression of Mr. S [REDACTED] is as follows. He
4 suffers from a personality change due to brain trauma. He has been previously
5 diagnosed with bipolar disorder, unspecified. Both of these diagnoses constitute
6 major and persistent mental illnesses per the Diagnostic and Statistical Manual
7 (DSM) IV Text Revision (TR).¹

8 I declare under penalty of perjury pursuant to 28 U.S.C § 1746 that the
9 foregoing is true and correct.

10 Dated this 3rd day of March, 2009 at Albany, New York.

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12 
13 Jose Alarcon, M.D.

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20 ¹ AMERICAN PSYCHIATRIC ASSOCIATION, DIAGNOSTIC AND STATISTICAL MANUAL
OF MENTAL DISORDERS: DSM-IV-TR. 392, 864 (AMERICAN PSYCHIATRIC
ASSOCIATION) (2000).

CERTIFICATE OF SERVICE

I hereby certify that on the 6th day of March, 2009, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: Matthew Sanger (sanger@ssglaw.org).

s/Mona Rennie

Legal Assistant

Disability Rights Washington

CERTIFICATE OF SERVICE

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